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15 Attorneys for Defendants LG Electronics, Inc.; and  
LG Electronics USA, Inc.; and LG Electronics  
16 Taiwan Taipei Co., Ltd.

17 [Additional Parties and Counsel Listed on Signature  
Pages]

18  
19 UNITED STATES DISTRICT COURT  
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NORTHERN DISTRICT OF CALIFORNIA  
21  
SAN FRANCISCO DIVISION

22 IN RE: CATHODE RAY TUBE (CRT) )  
ANTITRUST LITIGATION )

) Case: 3:07-cv-05944 SC

) MDL No. 1917

23 \_\_\_\_\_)  
24 This Document Relates To The Direct )  
Purchaser Action )

) **STIPULATION AND [PROPOSED] ORDER**  
**ON SPECIAL MASTER'S REPORT AND**  
**RECOMMENDATIONS REGARDING**  
**DEFENDANTS' MOTION TO COMPEL**  
**DISCOVERY ON DOWNSTREAM**  
**INFORMATION**

1           Direct Purchaser Plaintiffs (“DP Plaintiffs”), on the one hand, and the undersigned  
2 defendants, on the other hand, through their respective counsel, hereby stipulate and agree as  
3 follows:

4           WHEREAS on April 29, 2011, the undersigned defendants filed a Motion to Compel the DP  
5 Plaintiffs to Produce Downstream Discovery (Docket No. 925);

6           WHEREAS on May 31, 2011, the DP Plaintiffs filed an Opposition to Defendants’ Motion  
7 to Compel the Direct Purchaser Plaintiffs to Produce Downstream Discovery (Docket No. 941);

8           WHEREAS on June 15, 2011, the undersigned defendants, filed a Reply in Support of  
9 Defendants’ Motion to Compel the Direct Purchaser Plaintiffs to Produce Downstream Discovery  
10 (Docket No. 948);

11          WHEREAS on June 23, 2011, Special Master Charles A. Legge heard oral argument  
12 regarding the Motion to Compel the Direct Purchaser Plaintiffs to Produce Downstream Discovery;  
13 and

14          WHEREAS on July 13, 2011, Special Master Charles A. Legge issued and filed via ECF his  
15 Report and Recommendations on Discovery Regarding Downstream Information (Docket No. 966)  
16 (the “Report”) recommending that Defendants’ Motion to Compel Downstream Discovery be  
17 granted in part and denied in part;

18          IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the  
19 undersigned defendants and DP Plaintiffs, that:

20          1. Pursuant to Rule 53 of the Federal Rules of Civil Procedure and the Court’s June 16,  
21 2008 Order Appointing Special Master (Docket No. 302), the Special Master’s Recommendations,  
22 attached hereto as exhibit A, shall be entered as an Order of this Court.

1       2. Plaintiffs shall have 45 days from the entry of this Order to produce the information  
2 identified in the attached Report and Recommendation.

3       **IT IS SO STIPULATED.**

4       Dated: July 27, 2011

ARNOLD & PORTER LLP

5       By: /s/ Eric Shapland

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21 *Interim Lead Counsel for the Direct Purchaser*  
22 *Plaintiffs*  
23

1 Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of  
2 this document has been obtained from each of the above signatories.  
3  
4

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

5 Dated: July 28, 2011

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Hon. Samuel Conti  
7 United States District Judge  
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